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ORIGINAL
(Red)

WESTON
MANAGERS DESIGNERS/CONSULTANTS
WESTON WAY
WEST CHESTER, PA 19380
PHONE: 215-692-3030
TELEX: 83-5348

15 April 1987

Mr. Harry Daw
c/o U.S. Environmental Protection Agency
841 Chestnut Building
Philadelphia, Pa 19107

Dear Mr. Daw;

Attached is the NVF Company's proposed revision to Attachment A of the revised draft Consent Agreement and Order. The revisions are consistent with our recent telephone discussions aimed at formalizing the scope of sampling activities.

If you have any questions, please contact Brad McIlvain or myself.

Very truly yours,

ROY F. WESTON, INC.

Neil R. Rivers
Project Engineer

NRR/pmh

cc: A. DeFalco
W. Witt, Jr., P.E.
B. McIlvain
H. Trice

Enclosure

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PROPOSED ATTACHMENT A

NVF SITE, KENNETT SQUARE, PENNSYLVANI
SAMPLING PLAN

The objectives of the sampling study are to determine whether any poly-chlorinated biphenyl contamination does in fact exist on NVF's property, the extent and avenues of migration of such contamination if present, and the extent of such contamination, if it exists, in the vicinity of the NVF site in Kennett Square, Pennsylvania. Surface water, sediment and fish tissue analyses performed by the Pennsylvania Department of Environmental Resources and the U.S. Environmental Protection Agency have shown that waterways adjacent to, and downstream from, the NVF property have significant levels of contamination from, among other substances, poly-chlorinated biphenyls.

A. In compliance with this Consent Order NVF shall:

1. Submit to EPA an on-site sampling plan to identify and quantify the extent of poly-chlorinated biphenyl contamination in the areas of the facility described below. Sample analysis will be performed in such a manner as to identify the concentrations of the following Aroclor series analytes: 1016, 1221, 1232, 1242, 1248, 1254, and 1260.

   a. The number seven press pit area. This sampling will consist of taking liquid samples found in the press pit and a wipe sample from the pit walls to confirm the effectiveness of the cleanup performed in this pit.

   b. The sanitary sewer line draining the number seven press pit will also be sampled. Pipe scrapings or a wipe sample will be collected as appropriate as will a liquid sample from the discharge end of the sewer line.

   c. The former overflow pipe from the number seven press pit will be sampled downstream of the concrete seal at the press pit. A pipe scraping or wipe sample will be taken as appropriate.

d. Soil samples in the vicinity of outdoor electrical substations will be collected. A soil sample will be collected along the sursface water drainage path from each outdoor electrical substation.

e. The storm water control basin and its incoming pipes. Two sediment and one water sample will be collected from the storm water control basin. A discharge sample and a wipe sample will be collected dfrom each of the three p ipes feeding the storm water control basin.

f. The effluent outfall at Discharge 001. A discharge sample and a sediment sample will be collected at Discharge 001.

2. Submit to EPA an off-site sampling plan to identify and quantify the extent of poly-chlorinated biphenyl contamination in the off-site areas described below. Sample analysis will be performed in such a manner as to identify the concentration of the following Aroclor series analytes: 1016, 1221, 1232, 1242, 1248, 1254, and 1260.

a. A total of five locations along the swale and the unnamed tributary to the West Branch of the Red Clay Creek.

b. At the confluence of the unnamed tributary and the West Branch of the Red Clay Creek.

c. Two locations upstream and two locations downstream of the confluence of the unnamed tributary and the West Branch of the Red Clay Creek.

3. Submit to EPA a site specific safety plan detailing, among other things, levels of protective clothing worn by workers on site, respiratory protection, decontamination procedures, and measures taken to limit access to work areas by non-essential personnel.